

Corporate re-domiciliation panel report: Potential impact on structuring inward bound re-domiciliation

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Davis Polk partner Dominic Foulkes and counsel Freddie Schwier authored “Corporate re-domiciliation panel report: Potential impact on structuring inward bound re-domiciliation” in *Tax Journal*. In the article, they discuss the UK Independent Expert Panel’s report on corporate re-domiciliation, which was published in October 2024 and proposes a new company law regime to facilitate re-domiciliations to the UK. The proposal would significantly simplify the current options available to groups wishing to relocate their holding structure to the UK, and the tax implications of the proposed regime have been considered by the Panel, with recommendations made for its implementation.

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